

**UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION**

In re:

Case No. 13-53846

Honorable Thomas J. Tucker

City of Detroit, Michigan,

Chapter 9

Debtor,

NOTICE OF APPEAL AND STATEMENT OF ELECTION

Part 1: Identify the appellant(s)

1. Name(s) of appellant(s): B & C LAND DEVELOPMENT CORPORATION
-

2. Position of appellant(s) in the adversary proceeding or bankruptcy case that is the subject of this appeal:

For appeals in an adversary proceeding.

☐ Plaintiff

☐ Defendant

☐ Other (describe) _____

For appeals in a bankruptcy case and not in an adversary proceeding.

☐ Debtor

☒ Creditor

☐ Trustee

☒ Other (describe) Respondent

Part 2: Identify the subject of this appeal

1. Describe the judgment, order, or decree appealed from: Order Granting City of Detroit's Motion for Entry of an Order Enforcing the Plan of Adjustment Injunction
-
2. State the date on which the judgment, order, or decree was entered: 8/5/2015

Part 3: Identify the other parties to the appeal

List the names of all parties to the judgment, order, or decree appealed from and the names, addresses, and telephone numbers of their attorneys (attach additional pages if necessary):

- | | |
|---|--|
| 1. Party: <u>B&C Land Development Corporation</u> | Attorney: <u>Horace D. Cotton (P33268)</u>
<u>P.O. Box 19520</u>
<u>Detroit, MI 48219</u>
<u>(313) 595-1517</u> |
| 2. Party: <u>City of Detroit</u> | Attorney: <u>Mark N. Swanson</u>
<u>350 W. Jefferson, Suite 2500</u>
<u>Detroit, MI 48226</u>
<u>(313) 496-7591</u> |

Part 4: Optional election to have appeal heard by District Court (applicable only in certain districts)

If a Bankruptcy Appellate Panel is available in this judicial district, the Bankruptcy Appellate Panel will hear this appeal unless, pursuant to 28 U.S.C. § 158(c)(1), a party elects to have the appeal heard by the United States District Court. If an appellant filing this notice wishes to have the appeal heard by the United States District Court, check below. Do not check the box if the appellant wishes the Bankruptcy Appellate Panel to hear the appeal.

☒ Appellant(s) elect to have the appeal heard by the United States District Court rather than by the Bankruptcy Appellate Panel.

Part 5: Sign below

/s/ Horace D. Cotton

Date: 08/19/2015

Signature of attorney for appellant(s) (or appellant(s)
if not represented by an attorney)

Name, address, and telephone number of attorney
(or appellant(s) if not represented by an attorney):

Horace D. Cotton (P33268)

P. O. Box 19520

Detroit, MI 48219

(313 595-1517)

Fee waiver notice: If appellant is a child support creditor or its representative and appellant has filed the form specified in § 304(g) of the Bankruptcy Reform Act of 1994, no fee is required.